

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
2012 NOV 28 P 3:51

CLERK'S OFFICE  
AT GREENBELT

BY RC DEPUTY

1 NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,  
2 U.C.C.1-103.6, U.C.C.3-415, Natural Person IN FULL LIFE, SUI JURIS  
3 IN PROPRIA PERSONA  
4 4244 HILDRETH ST. SE.  
5 WASHINGTON, DC, [20019-9998]  
6 1-202-706-8063

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF COLUMBIA

9 NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,  
10 U.C.C.1-103.6, Natural Person IN FULL LIFE, SUI JURIS, IN PROPRIA PERSONA

11 Plaintiff, Claimant

12 VS.

CIVIL ACTION No.

13 CEO - GINO ARCHER  
14 CAVALRY PORTFOLIO SERVICES, LLC  
15 NEW YORK OPERATIONS  
16 500 SUMMIT LAKE DR.  
17 Valhalla, NY 10595  
18 1-914-347-3440 xt.13415

DKC 12 CV 3506

COMPLAINT

19 Defendant, Respondent

20 PRELIMINARY STATEMENT

21  
22 1. This is an action for damages brought from violations of the Fair Credit Reporting Act  
23 (FCRA) Title15 U.S.C. §1681 *et seq.*

24 JURISDICTION

25 2. The jurisdiction of this Court is conferred by Title15 U.S.C. §1681p.

26 FACTUAL ALLEGATION

27 3. On MAY 2, 2010, Defendant initiated a credit inquiry of Plaintiff's credit report from  
28 TRANSUNION without permissible purpose.

**COUNT I**

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C.§1681  
WILLFUL NON-COMPLIANCE BY DEFENDANT CAVALRY PORTFOLIO  
SERVICES,.LLC (DEBT COLLECTOR)**

3. Plaintiff is a consumer within the meaning of the FCRA, Title15 U.S.C.§1681a(c).

4. CAVALRY PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR), is a furnisher of information within the meaning of the FCRA, Title15 U.S.C. §1681s-2.

5. CAVALRY PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR), willfully violated the FCRA.

Defendant's Violations include, but are not limited to, the following:

(a) CAVALRY PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR), willfully violated Title15 U.S.C.§1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by Title15 U.S.C. §1681b.

**WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$1,000 a Month from the date of credit pull against consumer credit report.

CAVALRY PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR), are liable for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title15 U.S.C. §1681n.

**COUNT II**

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C. §1681  
NEGLIGENT NON-COMPLIANCE BY DEFENDANT CAVALRY PORTFOLIO  
SERVICES,.LLC (DEBT COLLECTOR),**

6. Plaintiff is a consumer within the meaning of the FCRA, Title15 U.S.C. §1681a(c).



1 7. CAVALRY PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR), is a furnisher of  
2 information within the meaning of the FCRA, Title15 U.S.C.§1681s-2.

3 8. CAVALRY PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR), negligently  
4 violated the FCRA.

5 Defendant's violations include, but are not limited to, the following:

6 (a) CAVALRY PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR) negligently  
7 violated 15 U.S.C. §1681b (f) by obtaining Plaintiff's consumer report without a permissible  
8 purpose as defined by Title15 U.S.C. §1681b.

9 **WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$1,000 a  
10 Month from the date of credit pull against consumer credit report, CAVALRY PORTFOLIO  
11 SERVICES,.LLC (DEBT COLLECTOR) are liable for actual damages, and attorney's fees and  
12 costs, pursuant to Title15 U.S.C. § 1681o.

13 **RELIEF**

14  
15 **WHEREFORE**, Plaintiff demands judgment for damages against, CAVALRY  
16 PORTFOLIO SERVICES,.LLC (DEBT COLLECTOR) in the amount \$33,000 for actual or  
17 statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title 15  
18 U.S.C.§1681n (a) (3) and Title15 U.S.C. §1681o (a)

19 **DEMAND FOR JURY TRIAL**

20  
21 Plaintiff hereby demands a trial by jury of all issues as a matter of law.

22 Respectfully submitted this 28<sup>th</sup> day of November, 2012

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